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December 23, 2014

BY ECF AND FAX

Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *In re LIBOR-Based Financial Instruments Antitrust Litig.*,
No. 11 Civ. 2613 (NRB), Master File No. 1:11-md-2262-NRB

Dear Judge Buchwald:

We represent the Exchange-Based Plaintiffs (“Plaintiffs”) in the above-referenced matter. We respectfully request an extension from January 2, 2015 until January 16, 2015 to submit the plan of notice, form of notice and summary notice related to the settlement with Barclays, as directed by Your Honor’s December 2, 2014 Memorandum and Order (the “Order”). ECF No. 861. No previous request has been made for an adjournment of this deadline.

Your Honor’s Order directed that Plaintiffs provide this information related to the settlement with Barclays within 30 days.

Plaintiffs have been working diligently to respond to the Order. Among the steps taken, Plaintiffs have:

- Obtained final cooperation from Barclays pursuant to the settlement agreement.
- Obtained bids from claims administrators and are in the process of selecting one.
- Developed a plan of notice (including direct notice) that may include obtaining detailed information from the Chicago Mercantile Exchange.
- Retained and started work with the Honorable Judge Nancy Gertner (Ret.), formerly of the District of Massachusetts, who will advise Plaintiffs’ counsel on ways to construct a process for fair allocation of the settlement proceeds among the class members.

Kirby McInerney LLP

Honorable Naomi Reice Buchwald
December 23, 2014
Page 2

- Worked with economists to construct a model to allocate damages across Eurodollar futures contracts and time periods.

Many of the professionals mentioned above (and counsel as well) have constrained availability during the holiday season, including and up to January 5, 2015. For this reason, Plaintiffs respectfully request this extension. Counsel for Barclays consents to this request and the other Defendants, through Defendants' Liaison Counsel, take no position. The extension requested herein does not affect any other scheduled dates.

Thank you very much.

Respectfully submitted,

/s/ Christopher Lovell
Christopher Lovell
LOVELL STEWART HALEBIAN
JACOBSON LLP

/s/ David E. Kovel
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Interim Co-Lead Counsel for Exchange-Based Plaintiffs and the Proposed Class

cc: All Counsel of Record (by Electronic Filing)